

Ciba Specialty Chemicals Corporation  
North America

Corporate  
Remediation Services

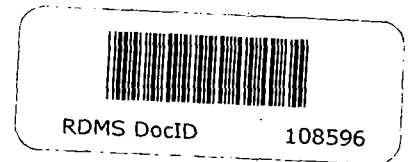
RCRA RECORDS CENTER  
FACILITY Ciba Geigy Corp  
I.D. NO. RID001194323  
FILE LOC. 9. R-9  
OTHER #108596

REC'D 11-17  
F.B.

November 13, 2001

Mr. Frank Battaglia  
HBT  
USEPA Region 1  
1 Congress Street  
Suite 1100  
Boston, MA 02114-2023

**Ciba**



RE: Ciba Property  
180 Mill Street, Cranston RI  
EPA ID: RID 001194323

Dear Mr. Battaglia:

Ciba Specialty Chemical Corporation (Ciba) submits this letter as a formal request for a Final Remedy Decision for the Warwick portion of the Ciba property, currently listed as a RCRA Corrective Action Site.

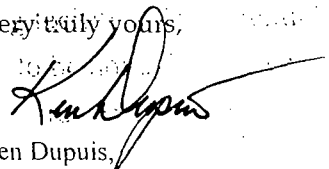
Herff Jones Corporation is a bona fide prospective purchaser for the Warwick portion of the former Ciba facility. Herff Jones and Ciba are completely unrelated corporate entities.

Herff Jones has contracted with Vanasse Hangen Brustlin, Inc. (VHB) to conduct an investigation of the Warwick parcel and to provide consultation services regarding previous investigations on the property. It is the conclusion of Ciba and VHB that no further remedial actions are necessary on the Warwick parcel under the RCRA Corrective Action program.

VHB investigations conducted under the RIDEM Brownfields program have found the property suitable for industrial and/or commercial use. VHB is in the process of compiling data for the Warwick parcel and will submit these data to RIDEM under its *Industrial Property Remediation and Reuse Act*. VHB will propose attaching an Environmental Land Use Restriction (ELUR) to the deed of the property, restricting the property to Commercial/Industrial land use and consideration of the building foundation, asphalt paved areas and landscaping to be part of the Site remedy.

It is the opinion of VHB and Ciba that this request is consistent with the Superfund Memorandum of Agreement signed in February 1997 between the RIDEM and the EPA whereby the agencies have agreed to avoid duplicative jurisdiction situations to the extent practical on similar sites. If you have any questions or need additional information, please feel free to contact me at (732) 914-2810.

Very truly yours,

  
Ken Dupuis,

Director of Operations